Title VI Fare Equity Analysis

Sound Transit General Fare Increase with Low-Income Fare Discount

Introduction

Sound Transit is considering a general fare increase with an associated low income fare discount to be implemented on March 1, 2015. In addition to the option to not change fares, three fare change alternatives are being considered:

- Alternative 1: Fare change on Central Link light rail only
- Alternative 2: Fare change on Central Link light rail and ST Express bus routes operated wholly within King County
- Alternative 3: Fare change on all Sound Transit services

Sound Transit is considering three alternatives because of the following agency fare policy goals:

> *Fare media and pricing are integrated regionally among partner transit agencies.*
> *Promote regional consistency in provisions for low income and transit dependent riders.*

One of our regional transit partners, King County Metro, is moving forward with a discounted low income fare and associated general fare increase, which has triggered Sound Transit's analysis of the same. The three alternatives considered in this analysis represent three different levels of commitment to providing a low income fare discount to meet Sound Transit's policy goals regarding regional fare integration and consistency.

Policy

It is the policy of Sound Transit to conduct a fare equity analysis during the planning phase of a potential fare change to determine whether the proposed fare change would have a disparate impact on minority populations and/or a disproportionate burden on low-income populations. If any disparate impact or disproportionate burden is found, Sound Transit will consider steps to avoid, minimize, or mitigate the adverse impacts and reanalyze the modified changes to determine if the impacts are removed or lessened.

Sound Transit's policy defines these impacts as follows:

> *A <u>disparate impact</u> occurs when the minority percentage of the population adversely affected by any fare change is greater than the average minority percentage of the population of Sound Transit's service area.*
>
> *A <u>disproportionate burden</u> occurs when the low income percentage of the population adversely affected by any fare change is greater than the average low income percentage of the population of Sound Transit's service area.*

Sound Transit's fare equity analysis policy, including a description of how the public was engaged in the development of the policy, is attached in the **Appendix**.

Definitions & Data Sources

The data used in this analysis is primarily from two surveys conducted by Sound Transit in 2011-2013. Low income data comes from the Origin-Destination survey conducted on all Sound Transit services in 2011-2012. The final sample size is 16,142 Sound Transit customers. Data were weighted to represent boardings at the corridor and route level for all services. For the purposes of this analysis, and to qualify for the low income fare discount, Low Income is defined as at or below 200% of the Federal poverty level. Since poverty level is defined by household size, the average household size for the Puget Sound Region of 2.4 was assumed. The Federal poverty level for two to three person households is approximately $15,000-$18,000. Given the data available on income for this analysis and a range of $30,000-$36,000 defining low income, survey respondents reporting household incomes less than $35,000 were considered "Low Income."

Minority data in this analysis comes from the Customer Satisfaction Survey conducted on all Sound Transit services in 2013. The final sample size is 1,503 Sound Transit customers. Data were weighted to represent boardings at the mode level for rail-based services and at the route level for Sound Transit Express bus service.

For the purposes of this analysis, five fare types are considered: Adult cash/ticket, adult ORCA, low income ORCA, Regional Reduced Fare Permit (RRFP), and Youth. ORCA stands for One Regional Card for All, and is the RFID-enabled fare card that can be used on all central Puget Sound transit services. Payment for transit fare through ORCA can be made using "E-Purse" (debit) or a pass product. Pass products are associated with a one-way fare value. RRFP is an ORCA product available to senior citizens (65+ years old) and persons with qualifying disabilities. RRFP card holders may use their RRFP cards in the same way as an ORCA card, or may present the card to validate a cash/ticket payment at the RRFP fare rate. Riders aged 6-18 are eligible for Youth fare, which can be paid through ORCA or cash/tickets with ID.

Fare Change Proposal and Fare Usage

Table 1 and Table 2 below display the nature of the proposed fare change by fare type as well as the number and percent of users of each fare type being proposed for increase or decrease, respectively. Note that all low-income adults are eligible for the low-income fare discount included in this fare change proposal.

Table 1. Proposed fare change by fare type

	Cost		Change	
Fare Type	Existing	Proposed	Absolute	Percentage
Adult Cash/Ticket	$2.00 - $5.25	$2.25 - $5.50	$0.25 - $0.25	5% - 13%
Adult ORCA	$2.00 - $5.25	$2.25 - $5.50	$0.25 - $0.25	5% - 13%
Low Income ORCA*	$2.00 - $5.25	$1.50 - $4.00	-$0.50 - -$1.25	-24% - -25%
Regional Reduced Fare Permit	$0.75 - $2.50	$1.00 - $2.75	$0.25 - $0.25	10% - 33%
Youth	$1.25 - $3.75	$1.50 - $4.00	$0.25 - $0.25	7% - 20%

*Low Income ORCA is not currently available, existing costs shown for comparison purposes. Low income adults currently paying adult fare would be eligible for the proposed Low Income ORCA fare.

Table 2. Current fare type usage by group

	Percent			Count		
Fare Type	Minority	Low Income	Overall	Minority	Low Income	Overall
Adult Cash/Ticket	18%	15%	10%	1,752,362	1,070,750	2,736,617
Adult ORCA	75%	71%	81%	7,328,058	5,029,787	21,822,530
Regional Reduced Fare Permit	1%	5%	3%	119,479	356,346	887,778
Youth	5%	6%	3%	458,004	413,038	858,490
Other	1%	2%	2%	99,566	169,942	657,395
Total				9,757,469	7,039,863	26,962,810

A higher proportion of minority and low income riders use the cash/ticket fare type than the overall Sound Transit ridership, and a lower proportion use the Adult ORCA fare type. Low income riders are more likely to use the Regional Reduced Fare Permit (RRFP), and both minority and low income riders are more likely than the overall ridership to use the youth fare type. However, in all three alternatives of

this fare change proposal, all fare media would be subject to the same fare increase, with low-income adults eligible for a fare *decrease* on the modes/routes included in each alternative. Staff conducted additional analysis to further evaluate the effects of these specific proposals.

Using survey data, staff analyzed the percentage of minority and low income riders that would experience positive and negative impacts from the introduction of an adult low income fare, compared to the percentage of non-minority and non-low income riders that would experience these impacts.

- In Alternative 1, low income adults riding Link light rail would be eligible for a fare decrease, while non-low income riders and low-income youth, seniors, and those with disabilities would be subject to a $0.25 fare increase on Link light rail.
- In Alterative 2, low income adults riding Link light rail and ST Express bus routes operated wholly within King County would be eligible for a fare decrease, while non-low income riders, low income youth, seniors, and those with disabilities, and riders of all incomes on ST Express routes operated in whole or in part outside of King County would be subject to a $0.25 fare increase on one-way fares on Link and ST Express.
- In Alternative 3, low income adults riding any Sound Transit service would be eligible for a fare decrease, while non-low income riders and low income youth, seniors, and those with disabilities would be subject to a $0.25 fare increase on all one-way fares.

Table 3 through Table 5 below display the percentage of riders in each group that would be positively and negatively affected in each alternative fare change scenario, as well as the makeup of Sound Transit ridership as a whole.

Table 3. Alternative 1: Impacts on minority and low income riders

	Sound Transit service area	Population negatively affected	Population positively affected
% minority	35%	30%	49%
% non-minority	65%	70%	51%
% low income	27%	10%	100%
% non-low income	73%	90%	0%

Table 4. Alternative 2: Impacts on minority and low income riders

	Sound Transit service area	Population negatively affected	Population positively affected
% minority	35%	33%	44%
% non-minority	65%	67%	56%
% low income	27%	16%	100%
% non-low income	73%	84%	0%

Table 5. Alternative 3: Impacts on minority and low income riders

	Sound Transit service area	Population negatively affected	Population positively affected
% minority	35%	31%	43%
% non-minority	65%	69%	57%
% low income	27%	5%	100%
% non-low income	73%	95%	0%

In all three alternatives, a greater percentage of minority and low income Sound Transit riders would be positively affected by the fare change than the percentage of minority and low income riders on Sound Transit services as a whole. Likewise, a lower percentage of minority and low income riders would be negatively affected by the proposed changes.

The composition of the rider group that is positively affected by the fare change is a higher proportion of minority and low income riders than the composition of Sound Transit riders overall. Likewise, the composition of those negatively affected by the fare change is a lower percentage of minority and low income riders than the composition of Sound Transit riders overall. Thus, the three fare change proposals do not have any disparate impacts to minority riders nor do they place disproportionate burden on low income riders.

Outreach Plan

Sound Transit will launch an extensive outreach plan and public comment period to educate riders and the general public about potential fare change scenarios and to collect public feedback on the proposals. In October 2014, a series of five public meetings, as well as a Public Hearing, will be held to ensure members of the public, community groups and project stakeholders have the opportunity to learn and comment on the fare change options. The official comment period is September 19 through October 23rd. The Board will take final action at their November 20th meeting.

Objectives

Activities during the comment period related to the fare proposal will:

- Reduce confusion by clearly articulating information about potential fare change options, especially through infographics;
- Recognize that the proposed fare change could affect all riders (regardless of income); provide access to the information to engage communities directly affected by the proposed fare change options;
- Offer a variety of methods for providing comments on the fare change proposal;
- Provide opportunities for members of the public to engage directly with project staff;
- Showcase Sound Transit's responsiveness to other agencies' policies and collaboration on fares across the region;
- Directly inform and engage existing riders on Sound Transit services; and seek engagement venues that are easily accessible by transit;
- Conduct outreach in geographically-relevant locales, where key audiences may be inclined to gather; and
- Comply with and go beyond Title VI intents related to engaging traditionally under-represented populations.

Notifications

As part of the proposed fare change option development, the outreach team will employ a robust notification strategy to ensure the public is aware of the opportunity to comment during the comment period. The following types of notification represent a broad combination of materials and notification vehicles to reach out to the community as a whole and invite feedback during the proposed fare change comment period.

Table 6. Comment period notification plan

Date	Notice	Detail
Ongoing (starting mid-September)	**Briefings to jurisdictions, stakeholder groups, and organizations**	Proposed fare changes are a component of major jurisdictional/ organizational briefings with key EJ and stakeholder groups, including Sound Transit's Citizens' Accessibility Advisory Committee
9/19	**Web announcement(s)**	Project web page on Sound Transit's website; home page/fares page announcements; open house listings on main activity calendar
9/19 (begins)	**Print and online display ads, including paid social media ads**	Regional and local papers, including publications to non-English speaking populations; Facebook/Twitter ads Run throughout comment period.
9/19 & 10/3	**Weekly CEO Report**	Blurb in CEO report concerning fare proposal, comment period and meeting schedule
9/22 (begins)	**Coach posters**	Placed on Sounder/ST buses/Link to advertise fare proposal
9/22	**Press Release**	Distributed by Sound Transit using regular media protocol (MRPI), launch of comment period.
9/22	**E-update**	Rider alert email distributed by Sound Transit via GovDelivery subscription service at launch of comment period **Approx. number of recipients: 21,500**
9/23 (begins)	**Sound Transit Facebook/Twitter**	Brief announcements of Proposed Fare Change comment period and public meetings. Running throughout comment period, likely two per channel.
9/25 & 10/2	**Board meeting – CEO report**	At Board meetings: CEO reports start of comment period concerning fare proposal; reminder about comment period and public meetings
10/6 deadline	**Legal notice for public hearing**	Placed by Board Administration in DJC

EJ – Environmental Justice
DJC – Daily Journal of Commerce

Comment Methods

Formal comment methods

Formal comments will be gathered and provided verbatim to the Sound Transit Board.

- Email: fares@soundtransit.org
- Phone: 1-866-940-4387

- Mail: Sound Transit | Attn: Brian Brooke | 401 S. Jackson St. | Seattle, WA 98104
- Online: Questionnaire/survey to be posted, accessed via www.soundtransit.org/farechange
- At public meetings: Comment form / printed survey / verbal comment at public hearing
- Foreign Language Line: 1-800-823-9230
- Accommodations for persons with disabilities: 1-800-201-4900 / TTY Relay 711

Public meetings

Five public meetings are proposed to take place in each of the sub areas in the Sound Transit district over a two-week period in October. All locations have been researched for proximity to transit centers and/or low income neighborhoods. The proposed public meeting format would include an open-house setting with proposed fare change option informational displays and a brief presentation.

Table 7. Public meeting schedule

Date/Day of Week	Time	Location
10/7/2014 Tuesday	5:30-7:30 p.m.	Everett Station, Weyerhaeuser Room 3201 Smith Ave., Everett
10/8/2014 Wednesday	5:30 7:30 p.m.	Meydenbauer Center, Rooms 402 & 403 11100 N.E. 6th St, Bellevue
10/9/2014 Thursday	5:30 7:30 p.m.	Korean Women's Association's Senior City, Suite 100 31635 23rd Ave. S, Federal Way
10/14/2014 Tuesday	5:30 7:30 p.m.	Freighthouse Square, Rainier Room 2501 East D St, Tacoma
10/16/2014 Thursday	5:30 7:30 p.m.	King's Hall 2929 27th Ave. S, Seattle

In addition to public meetings, the Sound Transit Board will hold a formal public hearing on Thursday, October 23. The hearing will take place in the Sound Transit Ruth Fisher Board Room, Union Station, 401 South Jackson St, Seattle at 12:00 p.m.

Public Outreach Report & Board Decision Schedule

A public outreach report compiling the results of the public and stakeholder meetings and formal public comment will be completed by November 14. The Executive Committee of the Sound Transit Board of Directors will consider the fare change proposals at their November 6 meeting, and a final Board decision is scheduled for November 20.

Appendix

Sound Transit Fare Equity Analysis Policy (R2013-19) & Staff Report

RESOLUTION NO. R2013-19

A RESOLUTION of the Board of the Central Puget Sound Regional Transit Authority establishing policies for conducting equity analyses of Fare Changes impacting minority and low income populations, in accordance with Title VI requirements and guidelines for Federal Transit Administration recipients.

WHEREAS, the Central Puget Sound Regional Transit Authority, hereinafter referred to as Sound Transit, has been created for the Pierce, King, and Snohomish Counties region by action of their respective county councils pursuant to RCW 81.112.030; and

WHEREAS, Sound Transit is authorized to plan, construct, and permanently operate a high-capacity system of transportation infrastructure and services to meet regional public transportation needs in the central Puget Sound region; and

WHEREAS, in general elections held within the Central Puget Sound Regional Transit Authority district on November 5, 1996 and November 4, 2008, voters approved local funding to implement a regional high-capacity transportation system for the central Puget Sound region; and

WHEREAS, Sound Transit has made a commitment to the people within its 3-county region to seek community involvement as it plans, designs, builds, and operate a regional transit system; and

WHEREAS, Sound Transit is a recipient of federal funding primarily from the Federal Transit Administration; and

WHEREAS, consistent with Title VI of the Civil Rights Act of 1964, Sound Transit is committed to:

- Providing services without regard to race, color, or national origin,
- Promoting the full and fair participation of affected populations in transit decision making,
- Preventing denial, reduction, or delay in benefits related to programs and activities that benefit minority or low-income populations, and

WHEREAS, in accordance with Title VI requirements and guidelines for FTA recipients, Sound Transit conducts an equity evaluation of major service changes and all fare changes to determine whether such changes result in adverse impacts on minority populations or impose burdens on low-income populations; and

WHEREAS, Sound Transit is to then evaluate whether the major service change or whether the fare change results in disparate impacts on minority populations or disproportionate burdens on low-income populations; and

WHEREAS, Sound Transit is to ensure inclusive public participation and take all reasonable steps to remove, explore alternatives or otherwise mitigate and reduce the disparate impacts on minority populations or disproportionate burdens on low-income populations; and

WHEREAS, in accordance with the FTA's Title VI requirements and guidelines, Sound Transit is to establish a policy defining the threshold to determine whether any Fare Change results in disparate impacts to minority populations or disproportionate burdens to low-income populations; and

WHEREAS, Sound Transit engaged the public in developing these policies in a manner consistent with Sound Transit's inclusive public participation policy.

NOW THEREFORE BE IT RESOLVED by the Board of Directors of the Central Puget Sound Regional Transit Authority, that in accordance with Title VI of the Civil Rights Act of 1964, and FTA requirements and guidelines, this policy is enacted to establish policies to conduct an equity analysis of fare changes to assess the impact of such changes on Minority and Low-Income populations.

BE IT FURTHER RESOLVED that all fare changes regardless of the amount of the increase or decrease (and including changes in payment type or payment media, and availability or duration of

paper or electronic transfers) will be subject to an equity analysis which includes an analysis of potential adverse effects on minority and low-income populations with the following exceptions:

1. Instances where Sound Transit has declared that all passengers will ride free.
2. Temporary fare reductions that are mitigating measures for other actions.
3. Promotional or temporary fare reductions lasting no more than six months.

BE IT FURTHER RESOLVED that when Sound Transit conducts an Equity Assessment of Fare Changes, the threshold for determining that the changes in question result in Disparate Impacts for minority populations or Disproportionate Burdens for low income populations are as follows:

1. Disparate Impact—a disparate impact occurs when the minority percentage of the population adversely affected by any fare change is greater than the average minority percentage of the population of Sound Transit's service area. As appropriate, Sound Transit will analyze any available information generated from ridership surveys indicating whether minority riders are disproportionately more likely to use the mode of service, payment type or payment media that would be subject to the fare change as a comparison in the analysis.
2. Disproportionate Burden—a disproportionate burden occurs when the low income percentage of the population adversely affected by any fare change is greater than the average low income percentage of the population of Sound Transit's service area. As appropriate, Sound Transit will analyze any available information generated from ridership surveys indicating whether low income riders are disproportionately more likely to use the mode of service, payment type or payment media that would be subject to the fare change as a comparison in the analysis.

BE IT FURTHER RESOLVED that if it finds that the fare change results in a potential disparate impact or potential disproportionate burden, then in accordance with Title VI of the Civil Rights Act

of 1964 and FTA requirements and guidelines, Sound Transit will consider steps to avoid, minimize or mitigate the adverse impacts and reanalyze the modified change(s) to determine if the impacts were removed or lessened.

BE IT FURTHER RESOLVED that prior to adopting the fare change(s), Sound Transit will include in its report the equity evaluation of the fare change(s), and that the public and Title VI stakeholders will be invited to provide comments regarding the change(s) including the steps to avoid, minimize or mitigate the adverse impacts and the modified change(s) to determine if the impacts were removed or lessened.

BE IT FURTHER RESOLVED that If Sound Transit chooses not to alter the proposed fare change(s), the implementation of the fare change(s) may proceed if there is a substantial legitimate justification for the fare change(s) and Sound Transit can demonstrate that there were no alternatives that would have less of an impact on minority or low income populations and would still accomplish Sound Transit's legitimate program goals.

ADOPTED by the Board of the Central Puget Sound Regional Transit Authority at a regular meeting thereof held on September 26, 2013.

Pat McCarthy
Board Chair

ATTEST:

Marcia Walker
Board Administrator

RESOLUTION NOs. R2013-18 and R2013-19

Establishing policies for conducting equity analyses of Major Service Changes and Fare Changes impacting minority and low income populations

MEETING:	DATE:	TYPE OF ACTION:	STAFF CONTACT:	PHONE:
Executive Committee Board	09/05/2013 09/26/2013	Recommend to Board Final Action	Leslie Jones, Diversity Programs Director **Alec Stephens, Diversity Technical Advisor**	206-398-5047 206-398-5019

PROPOSED ACTION

Resolution No. R2013-18: Establishing policies for conducting equity analyses of Major Service Changes impacting minority and low income populations

Resolution No. R2013-19: Establishing policies for conducting equity analyses of Fare Changes impacting minority and low income populations.

KEY FEATURES SUMMARY

- As a recipient of federal financial assistance, primarily from the Federal Transit Administration, Sound Transit must continue to ensure that it complies with Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination on the basis of race, color and national origin in any program receiving federal funds.
- The resolutions address how Sound Transit will proceed with major service changes or fare changes in a manner that complies with Title VI.
- The resolutions incorporate practices that Sound Transit has used in the past in assessing major service changes and fare changes. In compliance with Title VI Guidelines by the Federal Transit Administration, Sound Transit is to set forth those practices as policies adopted by the agency's policy-making body.
- Major Service Changes. A Title VI "equity evaluation" shall be conducted for all major service changes, which are defined as any single change in service on an individual bus or rail route that would add or eliminate more than 25 percent of the route's weekly platform service hours, *and/or* move the location of a stop or station by more than a half mile.
- Fare Changes. A Title VI "equity evaluation" shall be conducted for all fare changes except for:
    1. Instances where Sound Transit has declared that all passengers will ride free.
    2. Temporary fare reductions that are mitigating measures for other actions.
    3. Promotional or temporary fare reductions lasting no more than six months.
- The resolutions establish thresholds for determining whether proposed major service changes or fare changes indicate disparate impacts to minority populations or disproportionate burdens to low income populations, and outlines efforts to be made to mitigate such impacts, and conduct outreach activities to affected populations to ensure the inclusion of affected people in the process prior to the adoption of the proposed changes.
- The resolutions provide that the Title VI equity evaluation, mitigation efforts, and outreach activities will be included as a part of the record for consideration by Sound Transit prior to final action on the proposed major service change or fare change.

BACKGROUND

Section 601 of Title VI of the Civil Rights Act of 1964 states that:

> No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Sound Transit receives federal financial assistance to design and build the regional transit system through grants primarily awarded and administered by the Federal Transit Administration. As an FTA grant recipient, Sound Transit cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny an individual any service, financial aid or benefit provided under the program to which he or she might otherwise be entitled;
- Make distinctions in the quality, quantity or manner in which the service or benefit is provided; or
- Segregate or separately treat individuals in any matter related to the receipt of any service or benefit.

As Sound Transit operates its transit services—Link Light Rail, Regional Express Bus, and Sounder Commuter Rail, and associated facilities—it must ensure that such services are provided in an equitable manner. This includes decisions by Sound Transit to make major changes to its transit services or changes in its fare structures.

The two resolutions set a policy framework under which Sound Transit will evaluate proposed major service changes or fare changes that may be recommended for Sound Transit Board approval as follows:

1. Sound Transit includes in its evaluation whether such changes adversely affect minority or low income populations;
2. Determine if the adverse effects result in “Disparate Impacts to Minority Populations”, setting as a threshold effects that for the minority populations subject to the major service change are greater than the minority population in the Sound Transit District (currently, 31.13%); and/or result in “Disproportionate Burdens to Low Income Populations”, setting as a threshold effects that for the low income populations subject to the major service change are greater than the low income population in the Sound Transit District (currently, 11.24%);
3. If the proposed changes result in disparate impacts to minority populations and/or disproportionate burdens to low income populations Sound Transit will examine and develop ways to mitigate or lessen the effect, and alert the affected Title VI stakeholders of the proposed changes to allow them to comment on the change and the impacts.
4. The Title VI evaluation of the proposed major service changes or fare changes, the impacts, mitigation efforts, outreach to impacted stakeholders, and public comments will be a part of the record before the Sound Transit Board when it makes its decision to approve the major fare change or fare change in question.
5. The Sound Transit Board may approve the change unaltered and Sound Transit may proceed to implement the change “if there is a substantial legitimate justification for the change(s) and Sound Transit can demonstrate that there were no alternatives that would have less of an impact on minority or low income populations and would still accomplish Sound Transit’s legitimate program goals.”

FISCAL IMPACT

Not applicable to this action.

SMALL BUSINESS PARTICIPATION

Not applicable to this action.

EQUAL EMPLOYMENT WORKFORCE PROFILE

Not applicable to this action.

APPRENTICE UTILIZATION COMMITMENT

Not applicable to this action.

PUBLIC INVOLVEMENT

Over 60 organizations and individuals in the Sound Transit region, representing minority and low income advocacy, interest and community based organizations, were sent a letter notifying recipients of the proposed policies and soliciting comments. The letter included a summary of the proposed actions along with copies of the draft resolutions, and offering to provide further information or respond to questions. The information also contained a discussion of Title VI, and the process for public comment not only to staff, but also the dates and times of the Executive Committee and the Sound Transit Board meetings when consideration of the policies is scheduled should they decide to provide comments directly to Boardmembers. In addition, this information was provided to Sound Transit's Diversity Oversight Committee for discussion and comments at their meeting, held on August 23, 2013.

As set forth in the policies, more extensive outreach will take place regarding proposed major service changes or fare changes to populations affected by the particular change.

TIME CONSTRAINTS

The policies will be included in the Sound Transit 2013 Title VI Submittal to FTA. The Board is scheduled to take final action on a motion to approve the submittal at its September 26, 2013 meeting. Submittal is to be sent to FTA by October 1, 2013. It would be preferable to include the adopted policies, however, draft policies pending Board approval could be included if further consideration is required by the Board.

PRIOR BOARD/COMMITTEE ACTIONS

Resolution No. R2011-15—Adopted an inclusive public participation policy to assure meaningful access to public involvement and community outreach programs for minority, low-income and limited English proficient populations.

ENVIRONMENTAL REVIEW

JI 8/28/2013

LEGAL REVIEW

RM 8/29/2013